



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

them, if for their benefit. *Harman v. Davis*, 30 Gratt. 461. If prejudicial, it is not. *Dangerfield v. Smith*, 83 Va. 81. The fact that it is beneficial should appear from the record. *Morriss v. V. Ins. Co.*, 85 Va. 588. They may consent, by guardian *ad litem*, for the removal of a cause. *Lemmon v. Herbert*, 92 Va. 653. See on the subject generally, 1 Va. Law Reg. 472; 3 Id. 750; *Thompson v. Maxwell Land Grant Co.*, 168 U. S. 450.

NEGLIGENCE—ALLOWING HORSE TO STAND UNTIED.—From the fact that a quiet, gentle horse was left standing untied in the public street, free from the presence of anything which might frighten or disturb him, it appearing that the driver had been accustomed to use the horse in that way for many years without an accident, it is held, in *Belles v. Kellner* (N. J. Err. & App.) 57 L. R. A. 627, that no inference can arise that the act was negligent.

In *Bowen v. Flanagan*, 84 Va. 313, the driver had left his mule and cart standing in the street. The mule suddenly started off and collided with plaintiff, and a verdict for him on these facts against the owner of the vehicle was not disturbed. No inquiry was made as to the disposition of the mule.

CONTRACTS — SALE OR FARM OF PUBLIC OFFICE.—A contract between a sheriff and his deputy, providing that the deputy as such shall collect all the taxes and do all the work of the sheriff's office in one district, and that he shall have all the fees and commissions allowed by law upon the work done by him, and in consideration thereof shall pay the sheriff \$100 a year, is held in *White v. Cook* (W. Va.) 57 L. R. A. 417, to be in violation of the state statutes prohibiting the sale or farming of any office under the laws of the state.

Section 166 of the Virginia Code prescribes a penalty of perpetual disqualification *quod* that office of both parties to a contract to sell or farm any office of honor, trust or profit under the Constitution of Virginia. This statute is probably unconstitutional, so far as the penalty of future disqualification for holding office is concerned. See 3 Va. Law Reg. 471.

BANKRUPTCY—FAILURE OF BANKRUPT TO TURN OVER ASSETS—CONTEMPT. A court of bankruptcy cannot sentence a bankrupt to imprisonment for debt, and what it cannot do directly, it cannot do by indirection under another name. It cannot, therefore, lawfully order a bankrupt to deliver to the trustee money or property which he has not in his possession or under his control, and imprison him if he does not comply with the order. No new or enlarged jurisdiction in the matter of contempt is conferred upon the court by the Bankruptcy Act, and no power to impose a punishment which might not be rightly and lawfully imposed, on a similar state of facts, by any other United States Court under section 725 of the Revised Statutes. The mode of proceeding in a court of bankruptcy in contempt proceedings should conform to the established practice in all other federal